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*Attorneys for Creditor
Barnard Pipeline, Inc.*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

**NOTICE OF CONTINUED PERFECTION
OF MECHANICS LIEN PURSUANT TO 11
U.S.C. § 546(b)(2)**

Yuba County (Lien 2019-001019)

Barnard Pipeline, Inc. ("Barnard"), by and through its undersigned counsel, hereby gives notice of continued perfection of its mechanics lien under 11 U.S.C. § 546(b)(2), as follows:

1. Barnard has provided and delivered labor, services, equipment, and/or materials for the construction and improvements of projects located in the County of Yuba, State of California (the "Property"), the legal description for which is set forth in the Claim of Mechanics Lien, a true copy of which is attached hereto as **Exhibit A** (the "Mechanics Lien").

2. The Property is owned by PG&E Corporation and/or Pacific Gas and Electric Company (collectively, the "Debtors"), which filed voluntary petitions for relief under Chapter 11

1 of Title 11 of the United States Code (the "Bankruptcy Code") on January 29, 2019 (the "Petition
2 Date").

3 3. On January 28, 2019, before the Petition Date, Barnard properly and timely recorded
4 its Mechanics Lien under California Civil Code § 8400, *et seq.* in the Official Records of Yuba
5 County, State of California.

6 4. Through January 28, 2019, the amount owing to Barnard subject to its Mechanics
7 Lien is at least \$488,060.82, exclusive of accruing interest and other charges, and additional
8 amounts which have continued and are continuing, to accrue after the Petition Date.

9 5. California Civil Code § 8460(a) provides that:

10 The claimant shall commence an action to enforce a lien within 90
11 days after recordation of the claim of lien. If the claimant does not
12 commence an action to enforce the lien within that time, the claim
of lien expires and is unenforceable[.]

13 6. Pursuant to California Civil Code § 8460, an action to enforce a lien must be
14 commenced within 90 days after recordation of the claim of lien. However, section 362 of the
15 Bankruptcy Code automatically stays Barnard from filing a state court action to enforce its
16 mechanics lien. *See* 11 U.S.C. § 362.

17 7. Section 546(b)(2) of the Bankruptcy Code provides that when applicable law

18 ... requires seizure of such property or commencement of an action
19 to accomplish such perfection, or maintenance or continuation of
20 perfection of an interest in property; and ... such property has not
21 been seized or such an action has not been commenced before the
22 date of the filing of the petition; such interest in such property shall
be perfected, or perfection of such interest shall be maintained or
continued, by giving notice within the time fixed by such law for
such seizure or such commencement.

23 *See* 11 U.S.C. § 362; *see also Village Nurseries v. Gould (In re Baldwin Builders)*, 232 B.R. 406,
24 410-11 (9th Cir. 1999); *Village Nurseries v. Greenbaum*, 101 Cal.App.4th 26, 41 (Cal. Ct. App.
25 2002).

26 8. Accordingly, Barnard hereby provides notice of its rights as a lienholder in the
27 Property pursuant to California's mechanics lien law. Barnard is filing and serving this notice to
28 perfect, preserve, maintain, and continue the perfection of its lien and its rights in the Property to

1 comply with the requirements of California state law, 11 U.S.C. §§ 362(a), 362(b)(3), and
2 546(b)(2), and any other applicable law. This notice constitutes the legal equivalent of having
3 recorded a mechanics lien in the recorder's office for the county where the Property is located and
4 then having commenced an action to foreclose the lien in the proper court. By this notice, the
5 Debtors and other parties in interest are estopped from claiming that the lawsuit to enforce
6 Barnard's mechanics lien was not timely commenced pursuant to applicable state law. Barnard
7 intends to enforce its lien rights to the fullest extent permitted by applicable law. The interests,
8 perfected, maintained, or continued by 11 U.S.C. § 546(b)(2) extend in and to the proceeds,
9 products, offspring, rents, or profits of the Property.

10 9. The filing of this notice shall not be construed as an admission that such filing is
11 required under the Bankruptcy Code, the California mechanics lien law, or any other applicable
12 law. In addition, Barnard does not make any admission of fact or law, and Barnard asserts that its
13 lien is senior to and effective against entities that may have acquired rights or interests in the
14 Property previously.

15 10. The filing of this notice shall not be deemed to be a waiver of Barnard's right to
16 seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of any other
17 rights or defenses.

18 11. Barnard reserves all rights, including the right to amend or supplement this notice.

19 Dated: April 11, 2019

**WATT, TIEDER, HOFFAR & FITZGERALD,
L.L.P.**

20
21 By: 

Jane G. Kearn (CA 156560)
Colin C. Holley (CA 191999)
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Telephone: 949-852-6700
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*Attorneys for Creditor
Barnard Pipeline, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2019, I caused a copy of the foregoing Notice of Continued Perfection of Mechanics Lien Pursuant to 11 U.S.C. § 546(b)(2) to be sent via e-mail and/or first-class mail to the parties identified in the Master Core/2002 Service List attached hereto as **Exhibit B**.


Jane G. Kearl

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EXHIBIT A

275-214

[Rev. 09/20/13]

PLEASE COMPLETE THIS INFORMATION

RECORDING REQUESTED BY:

Barnard Pipeline, Inc.

WHEN RECORDED MAIL TO:

NAME: Watt, Tieder, Hoffar & Fitzgerald, LLP

ADDRESS: 2040 Main Street, Suite 300

CITY/STATE/ZIP: Irvine, CA 92614

2019-001019

01/28/2019 10:40 AM Page 1 of 4

Total Fee: \$106.00

Recorded in Official Records
County of Yuba State of CA
Terry A. Hansen
County Clerk and Recorder



THIS SPACE FOR RECORDER'S USE ONLY

DOCUMENT TITLE

MECHANICS' LIEN

THIS PAGE ADDED TO PROVIDE ADEQUATE SPACE FOR RECORDING INFORMATION (Govt. Code 27361.6)
(additional recording fee applies)

2
Recording requested by:
Barnard Pipeline, Inc.

And when recorded mail this document to:

Jane G. Kearl, Esq.
Robert C. Shaia, Esq.
Watt, Tieder, Hoffar & Fitzgerald, LLP
2040 Main Street, Suite 300
Irvine, CA 92614

For recorder's use

MECHANICS' LIEN
(Cal. Civ. Code § 8416, et seq.)

1. BARNARD PIPELINE, INC. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the County of Yuba, State of California, and more particularly described as:

All right, title and interest of Pacific Gas and Electric Company ("PG&E") in all easements and all improvements, structures, and pipelines therein, in or on which Claimant provided labor, services, equipment, and/or materials as set forth in paragraph 2, including, specifically, without limitation, all right, title and interest of PG&E in improvements, structures and pipelines located approximately at 1001 Feather River Boulevard, Olivehurst, CA (APN 01612001900).

2. After deducting all just credits and offsets, the sum of \$488,060.82 together with interest at the rate of 10% per annum from January 22, 2019, is due Claimant for the following: labor, services, equipment, and/or materials for relocated and upgrading high pressure regulator station, and related construction work performed under the Alliance Agreement Contract between Claimant and PG&E and Contract Work Authorization No. C9941, or as otherwise requested by PG&E.

3. Claimant furnished the labor, services, equipment and/or material at the request of: PG&E.

4. The name and address of the owner(s) or reputed owner(s) of the real property is/are: PG&E, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

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5. Claimant's address is: 701 Gold Avenue, Bozeman, MT 59715.

Dated January 22, 2019

BARNARD PIPELINE, INC.

By: [Signature]
Zach Bowler, Vice President

VERIFICATION

I, Zach Bowler, am the Vice President of Claimant on the foregoing Mechanics Lien and am authorized to make this verification for and on its behalf. I have read the foregoing Mechanics Lien and know the contents of the Mechanics Lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated January 22, 2019

By: [Signature]
Zach Bowler, Vice President

NOTICE OF MECHANICS LIEN

ATTENTION!

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS STATE LICENSE BOARD WEB SITE AT www.cslb.ca.gov.

PROOF OF SERVICE

I, Julie Benton, declare:

I am employed in the County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 2040 Main Street, Suite 300, Irvine, California 92614-6232.

On January 23, 2019, I served ☐ the originals ☒ true copies of the following document(s) described as MECHANICS LIEN and NOTICE OF MECHANICS' LIEN on the interested parties in this action, by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Irvine, California addressed as set forth below:

Pacific Gas & Electric Company (PG&E)
77 Beale Street, 32nd Floor
San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 23, 2019, at Irvine, California.


Julie Benton

EXHIBIT B

| | | | | | | | | | | |
|--|--|--|--|----------------|---------------|----|------------|--------------|--------------|--|
| Counsel for Mina Trevisan, including other Fire Victim Trust Plaintiffs | ADLER LAW GROUP, APC | Attn: E. Elliot Adler, Geoffrey E. Marr, Brittain S. Zimmmer | 402 West Broadway | Suite 850 | San Diego | CA | 92101 | 619-531-8700 | 619-342-9500 | Esder@TheAdlerFirm.com geoffrey53@hotmail.com bzimmer@TheAdlerFirm.com |
| Counsel for Aera Energy LLC, Midway Sunset Corporation Company | Aera Energy LLC | Attn: Ren A. Symm | 10000 Midway Avenue | | Bakersfield | CA | 93311 | 661-655-5791 | | RASym@AeraEnergy.com |
| Counsel to TRANSWESTERN PIPELINE COMPANY, LLC | AKERMAN LLP | Attn: EVELINA GENTRY Attn: JOHN E. MITCHELL and YELINA ARCHANA | 601 West Fifth Street, Suite 300 2001 Ross Avenue, Suite 3600 | | Los Angeles | CA | 90073 | 213-688-9500 | 213-627-6342 | evelina.gentry@akerman.com yelina.archana@akerman.com john.mitchell@akerman.com |
| Counsel to TRANSWESTERN PIPELINE COMPANY, LLC | AKERMAN LLP | Attn: Ashley Viscusi Crawford | 580 California Street | Suite 1500 | San Francisco | CA | 94104 | 415-765-9500 | 415-765-9501 | aviscusi@akerman.com |
| Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company | Akin Gump Strauss Hauer & Field LLP | Attn: David P. Simons | 1999 Avenue of the Stars | Suite 600 | Los Angeles | CA | 90067 | 310-229-1000 | 310-229-1001 | dsimons@akingump.com mstamne@akingump.com ldierker@akingump.com |
| Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company | Akin Gump Strauss Hauer & Field LLP | Attn: Michael S. Steiner, Ira S. Obermeyer, David H. Bortner | One Bryant Park | | New York | NY | 10036 | 212-872-1000 | 212-872-1002 | phogson@andoverbaron.com joh@andoverbaron.com joh@andoverbaron.com |
| Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company | Akin Gump Strauss Hauer & Field LLP | Attn: Anne Andrews, Sean T. Higgins, and John C. Thornton | 4701 Von Kaman Ave | Suite 300 | Newport Beach | CA | 92660 | 949-748-1000 | | anne@andoverbaron.com sean@andoverbaron.com john@andoverbaron.com |
| Counsel to Molokini, Inc. | ANDREWS & THORNTON | | | | | | | | | |
| Counsel for BOKF, NA, solely in its capacity as Underwriter Trustee | ARENT FOX LLP | Attn: Andrew I. Siffen, Beth M. Brownstein, Jordana L. Bennett Attn: Andy S. Kong and Christopher K.S. Wong | 1301 Avenue of the Americas | 42nd Floor | New York | NY | 10019 | 212-484-3900 | 212-484-3990 | andy.kong@arentfox.com christopher.wong@arentfox.com |
| Counsel for BOKF, NA, solely in its capacity as Underwriter Trustee | ARENT FOX LLP | Attn: Aaron Grubisjan Attn: Brian Lehan, Esq., Steven Fruchter, Esq. | 555 West Fifth Street | 48th Floor | Los Angeles | CA | 90013-1065 | 213-629-7400 | 213-629-7401 | Aaron.Grubisjan@arentfox.com brian.lehan@arentfox.com steven.fruchter@arentfox.com |
| Counsel for AT&T | Arnold & Porter Kaye Scholer LLP | Attn: James W. Grudis, Esq. Attn: XAVIER BECERRA, DANETTE VALDEZ, and ANNAEL ALMENDARAS | 250 West 55th Street One AT&T Way, Room | 48th Floor | New York | NY | 10019 | 212-836-8000 | 212-836-8889 | arnold@arnoldporter.com dvaldez@ajkay.com almeidara@ajkay.com |
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| Special Bankruptcy Counsel for Certain Fire Damage Plaintiffs Claimant | BAILEY AND ROMERO LAW FIRM | Attn: ERIC E. SAGERMAN, Lauren T. Attard | 12518 Beverly Boulevard | | Whittier | CA | 90601 | 562-889-0162 | | msagerman@baleiromero.com lattard@baleiromero.com |
| Proposed Counsel for Official Committee of Tort Claimants | BAKER & HOSTETTER, LLP | Attn: Eric E. Sagerman, Lauren T. Attard | 111601 Washline Blvd. | Suite 1400 | Los Angeles | CA | 90005-0509 | 310-442-8875 | 310-820-8839 | eric@bakertort.com lauren@bakertort.com |
| Counsel for NRG Energy Inc., Cleanway Energy, Inc., and Cleanway Energy Group LLC | Baker Bots LLP | Attn: C. Luke McDowell, Ian E. Roberts, Kevin Chiu | 2001 Ross Avenue | Suite 1000 | Dallas | TX | 75201 | 214-933-6500 | 415-726-5544 | ian@bakertort.com kevin.chiu@bakertort.com Nehi.Ohilion@bakertort.com |
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| Counsel for Phillips and Jordan, Inc., Counsel for APTMA, Counsel for TTR Substations, Inc., Counsel for Station Companies, Inc. | Baker, Donelson, Bearman, Caldwell & Berlowitz, PC | Attn: Lacey E. Rochester, Jan M. Hayden | 201 St. Charles Avenue, Suite 3600 | Suite 800 | New Orleans | LA | 70170 | 504-566-5200 | 504-636-4000 | lrochester@bakertort.com jhayden@bakertort.com |
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| | | | | | | | | | |
|---|--|--|---|--|--------------------|------------|--------------|--------------|---|
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| California Public Utilities Commission CIVILIAN PRODUCTS COMPANY, A DIVISION OF CHEVRON U.S.A. INC. | Chevron Products Company, A Division of Chevron U.S.A. Inc. | Attn: Ardis Angler | 505 Van Ness Avenue | 17th Floor | San Francisco, CA | 94102 | 415-703-2015 | 415-703-2262 | ardis@chevron.com Harris@bindermatter.com matt@chevron.com |
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| Counsel for BlueMountain Capital Management, LLC Counsel for Office of Unemployment Compensation Tax Services Counsel for Decon Construction Company Inc., Calaveras Telephone Company, Kernan Telephone Co., Pinard Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., Victor Telephone Company and TDS Telecom | Clary Gottlieb Shoen & Hamilton LLP | Department of Labor and Industry | One Liberty Plaza | 651 Ross Street, Room 702 | New York, NY | 10006 | 212-225-2000 | 212-225-3999 | clary@clarygottlieb.com Harris@bindermatter.com Shoen@clarygottlieb.com |
| Commonwealth of Pennsylvania | | | | | Harrisburg, PA | 17121 | 717-787-7672 | 717-787-7671 | harris@commonwealth.com |
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| CORREY, LUTZACH, DE GHEVALD & MIDDLE LLP | | Attn: Dario de Ghevald, Amanda L. Riddle, Steven M. Berk, Sumble Mansoor | 700 El Camino Real | PO Box 669 | Malibu, CA | 94039-0669 | 805-871-5866 | 805-871-4144 | dario@correyllp.com Harris@bindermatter.com Steven@correyllp.com |
| COUNCIL FOR FIRE VICTIM CREDITORS Individual Plaintiffs Executive Committee appointed by the California Superior Court in the North Bay Fire Cases, Judicial Council Coordination Proceeding Number 055, Pursuant to the terms of the Court's Case Management Order No. 1 | CORREY, LUTZACH, DE GHEVALD & MIDDLE LLP | | | | | | | | |
| Counsel for Fire Victim Creditors Individual Plaintiffs Executive Committee appointed by the California Superior Court in the North Bay Fire Cases, Judicial Council Coordination Proceeding Number 055, Pursuant to the terms of the Court's Case Management Order No. 1 | CORREY, LUTZACH, DE GHEVALD & MIDDLE LLP | | | | | | | | |
| Attn: Frank M. Pittre, Alison E. Cordova, Abigail D. Blodgett | | | San Francisco Airport Office Center | Suite 200 | Burlingame, CA | 94010 | 650-697-6000 | 650-697-6000 | fpittre@correyllp.com Harris@bindermatter.com Alison@correyllp.com |
| Attn: Timothy Curtis | | | County Administration Center | 575 Administration Drive, Room 105A | Santa Rosa, CA | 95403 | 707-565-2421 | 707-565-2421 | timothy@correyllp.com |
| Attn: Eric May | | | 825 Court Street | Room 201 | Woodland, CA | 95695 | 530-666-8278 | 530-666-8279 | eric@correyllp.com |
| Attn: Mark D. Plevin, Brendan V. Kulien | | | Three Embarcadero Center, 26th Floor | | San Francisco, CA | 94111 | 415-986-2800 | 415-986-2827 | mark@correyllp.com |
| Attn: Mortuie D. Ahly | | | 1001 Pennsylvania Avenue, N.W. | | Washington, DC | 20004 | 202-624-2500 | 202-624-2500 | mortuie@correyllp.com |
| Attn: Jade H. Yoon | | | 3001 Pennsylvania Ave., 3 Embarcadero Center | 26th Floor | San Francisco, CA | 94111 | 415-986-2800 | 415-986-2827 | jade@correyllp.com |
| Attn: Thomas F. Kozel | | | | | | | | | |
| Attn: Michael S. Danko, Kristine K. Meredith, Shawn R. Miller | | | 333 Twin Dolphin Drive | Suite 145 | Redwood Shores, CA | 94065 | 650-453-3600 | 650-394-8872 | mdanko@correyllp.com |
| Attn: Andrew D. Yaple | | | 1600 El Camino Real | | Menlo Park, CA | 94025 | 650-752-2000 | 650-752-2111 | andrew@correyllp.com |
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654 | 655 | 656 | 657 | 658 | 659 | 660 | 661 | 662 | 663 | 664 | 665 | 666 | 667 | 668 | 669 | 670 | 671 | 672 | 673 | 674 | 675 | 676 | 677 | 678 | 679 | 680 | 681 | 682 | 683 | 684 | 685 | 686 | 687 | 688 | 689 | 690 | 691 | 692 | 693 | 694 | 695 | 696 | 697 | 698 | 699 | 700 | 701 | 702 | 703 | 704 | 705 | 706 | 707 | 708 | 709 | 710 | 711 | 712 | 713 | 714 | 715 | 716 | 717 | 718 | 719 | 720 | 721 | 722 | 723 | 724 | 725 | 726 | 727 | 728 | 729 | 730 | 731 | 732 | 733 | 734 | 735 | 736 | 737 | 738 | 739 | 740 | 741 | 742 | 743 | 744 | 745 | 746 | 747 | 748 | 749 | 750 | 751 | 752 | 753 | 754 | 755 | 756 | 757 | 758 | 759 | 760 | 761 | 762 | 763 | 764 | 765 | 766 | 767 | 768 | 769 | 770 | 771 | 772 | 773 | 774 | 775 | 776 | 777 | 778 | 779 | 780 | 781 | 782 | 783 | 784 | 785 | 786 | 787 | 788 | 789 | 790 | 791 | 792 | 793 | 794 | 795 | 796 | 797 | 798 | 799 | 800 | 801 | 802 | 803 | 804 | 805 | 806 | 807 | 808 | 809 | 810 | 811 | 812 | 813 | 814 | 815 | 816 | 817 | 818 | 819 | 820 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987 | 988 | 989 | 990 | 991 | 992 | 993 | 994 | 995 | 996 | 997 | 998 | 999 | 1000 |
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| Counsel for CALIFORNIA SELF-INSURERS SECURITY GROUP | MAXIMILIAN A. FESULIO | Attn: MAXIMILIAN A. FESULIO | 55 West 46th Street | | New York | NY | 10036 | 212-940-3111 | 212-940-3111 | info@maximilianfesulio.com | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Counsel for CALIFORNIA SELF-INSURERS SECURITY GROUP | MAXIMILIAN A. FESULIO | Attn: MAXIMILIAN A. FESULIO | 55 West 46th Street | | New York | NY | 10036 | 212-940-3111 | 212-940-3111 | info@maximilianfesulio.com | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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